EXHIBIT 2

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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CHARLENE CARTER,	§
	§
Plaintiff,	§
	§
V.	§ Civil Case No. 3:17-cv-02278-X
	§
SOUTHWEST AIRLINES CO., AND	§
TRANSPORT WORKERS UNION OF	§
America, Local 556,	§
	§
	§
Defendants.	§

DECLARATION OF PAULO B. MCKEEBY

- I, Paulo B. McKeeby, declare as follows:
- 1. I am at least 18 years old. I have personal knowledge of the facts stated herein, and if called as a witness, could competently testify thereto.
- 2. I am a Partner at Reed Smith LLP in the firm's Dallas, Texas office. I have held that position since approximately July 2019.
- 3. My job duties as Partner include, among other things, overseeing Defendant Southwest Airline Co.'s ("Southwest") legal defense in this lawsuit. In connection therewith, I have been involved in Southwest's attempts to procure witnesses Plaintiff Charlene Carter ("Plaintiff") has sought to depose in this matter.
- 4. After the Court issued its order requiring the depositions of Southwest employees

 Brett Nevarez and Brian Talburt, Southwest's Senior Attorney Employment Practices &

Litigation, Chris Mayberry, sent both employees emails attaching the Court's order and asking

that they both attend their depositions as noticed on July 3 and 4.

5. Based on Mr. Nevarez and Mr. Talburt's actions, it appeared clear that both

employees were attempting to avoid deposition and, previously, trial subpoenas.

6. Hours after Southwest's counsel sent the emails to Mr. Nevarez and Mr. Talburt,

counsel for Plaintiff sent an email to counsel for all parties indicating that Mr. Nevarez, but not

Mr. Talburt, had been served with the deposition subpoena.

7. This timeline suggested that Mr. Nevarez was no longer avoiding service and

Southwest, through the undersigned, directed its attention to securing the attendance at deposition

of Mr. Talburt, who, based on reports I had received from Plaintiff's counsel, was still attempting

to avoid service.

8. On the night of Saturday, July 2, 2022, I was finally able to connect with Mr.

Talburt by telephone. After a conversation that lasted about an hour, I was able to convince Mr.

Talburt to agree to appear voluntarily for deposition the next day as noticed.

9. Plaintiff's counsel took the deposition of Mr. Talburt on July 3, 2022.

10. Mr. Nevarez, despite being served and despite receiving the post-service reminder

notice from Mr. Mayberry, failed to attend his deposition on July 4, 2022.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct. Executed in Dallas, Texas on July 26, 2022.

Paulo Mckeeby

Paulo B. McKeeby